

INGRAM YUZEK GAINEN CARROLL & BERTOLOTTI, LLP

**250 PARK AVENUE
NEW YORK, NEW YORK 10177
Telephone (212) 907-9600
Facsimile (212) 907-9681
www.ingramllp.com**

Jessica L. Rothman

October 5, 2010

Writer's Direct Dial: (212) 907-9624
E-Mail: JROTHMAN@INGRAMLLP.COM

Member: Legal Netlink Alliance
www.legalnetlink.net

VIA ECF

Hon. Viktor Pohorelsky
United States District Court
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

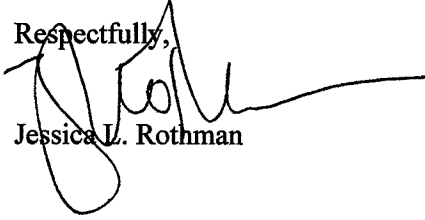
**Re: Brown v. St. John's University
Civ. Action No. 08-2208**

Dear Judge Pohorelsky:

We represent defendant Butler Rogers Baskett Architects, P.C. ("BRB") in the referenced matter. I am writing in support of St. John's University's ("SJU") request for an extension of the October 1, 2010 deadline for the filing of discovery motions. While I have received and (briefly) reviewed the written discovery responses from SJU, GCA Services Group, Inc., Skanska USA Building, Inc. and Langan Engineering and Environmental Services, Inc. ("Langan"), I only received the last of those responses (from Langan) on September 28, only 3 days before the existing October 1 deadline. Thus I have not yet had an opportunity to confer with counsel for those parties concerning the adequacy of those responses. I admit that I served BRB's demands after the August 9 deadline set in the July 9 Scheduling Order, but none of the parties' counsel objected, as indicated by their having responded to all of BRB's demands. I have not yet received any responses from HM White Site Architects ("HM White") although I have been assured by HM White that responses are forthcoming.

It did not seem prudent for me to file discovery motions concerning the adequacy of the responses received or HM White's failure to respond, considering the Court's reminder in the Scheduling Order that the parties are required to discuss any disputes in person or by telephone before making any discovery motions. I am therefore joining in SJU's request for an extension of time to file discovery motions to permit me to confer with the co-defendants' counsel concerning the adequacy of their responses.

Respectfully,


Jessica L. Rothman

JLR/

cc: All Counsel (Via ECF)